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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 BRIAN BORENSTEIN, an individual,  
18  
19 Plaintiff,

20 vs.

21 THE ANIMAL FOUNDATION, a domestic  
22 nonprofit corporation; *et al.*  
23 Defendants.  
24

Case No.: 2:19-cv-00985-APG-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR PLAINTIFF TO RESPOND  
TO [ECF 68] MOTION TO DISMISS  
FIRST AMENDED COMPLAINT BY  
DEFENDANTS COUNTY OF CLARK  
AND VICTOR ZAVALA  
(Second Request)**

25 COMES NOW Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene  
26 K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., and Defendants,  
27 COUNTY OF CLARK, and VICTOR ZAVALA, by and through their counsel, Jonathan D.  
28 Blum, Esq., of the law firm Wiley Petersen, and hereby request the Court to extend the

1 deadlines for Plaintiff to respond to [ECF 68] *Motion to Dismiss First Amended Complaint by*  
2 *Defendants County of Clark and Victor Zavala* by one week from **Friday, September 25, 2020**  
3 **to Friday, October 2, 2020**

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This is the second request for an extension. The original deadline was August 14, 2020. The parties submit that this request is made in good faith and not for the purpose of undue delay but is related to caseload and calendar deadlines for Plaintiff's counsel.

DATED this 25th day of September 2020.

THE PALMER LAW FIRM, P.C.

By: / s / **Raelene K. Palmer**

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DATED this 25th day of September 2020.

By: / s / **Robert S. Melcic**

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DATED this 25th day of September 2020.

WILEY PETERSEN

By: / s / **Jonathan D. Blum**

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*Attorneys for Defendants, County of  
Clark and Victor Zavala*

**ORDER**

IT IS SO ORDERED.

DATED: September 25, 2020.

  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2020, I caused to be served a copy of the foregoing *Stipulation and [Proposed] Order for Plaintiff to Respond to [ECF 68] Motion to Dismiss First Amended Complaint by Defendants County of Clark and Victor Zavala (First Request)*, by electronic filing through the Court's CM/ECF system, addressed to:

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An employee of The Palmer Law Firm, P.C.